Judge: Samuel J. Steiner
Chapter: 11
Ex Parte

UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re ADAM GROSSMAN, Debtor.	No. 10-19817 ***EX PARTE*** MOTION TO SHORTEN TIME TO HEAR TRUSTEE'S MOTION TO CONVERT CASE FROM A CHAPTER 11 TO A CHAPTER 7; 2) COMPEL CINDY LOEGERING TO PROVIDE ACCOUNTING OF RENTAL INCOME RECEIVED AND DISBURSED FOR ALL REAL PROPERTY MANAGED FOR OR ON BEHALF OF THE DEBTOR; AND 3) COMPEL DEBTOR AND/OR CINDY LOEGERING TO TURNOVER RENTAL PROCEEDS FROM REAL PROPERTY LOCATED AT 773 METRO WAY, REDDING, CALIFORNIA FOR JANUARY, FEBRUARY AND MARCH OF 2011

Ronald G. Brown, the Chapter 11 Trustee, by and through counsel, Wood & Jones, P.S. and Denice Moewes, brings this *ex parte* motion before this Court for an order shortening time to hear the Trustee's Motion to 1) convert the Case from Chapter 11 to Chapter 7; 2) Compel Cindy Loegering to Provide an Accounting for Rental Income Received and Disbursed for all Real Property Managed for or on Behalf of Debtor; and 3) Compel Debtor and/or Cindy Loegering to Turnover Rental Proceeds from Real Property Located at 773 Metro Way, Redding, California for January, February and March of 2011 ("Trustee's Motion")) for the reasons set forth below.

Background

The debtor filed a pro se voluntary chapter 11 petition on June 25, 2010 which was assigned case number 10-17334. The case was dismissed on July 22, 2010 for failure to file schedules.

Wood & Jones, P.S.
303 N. 67th Street
Seattle WA 98103
(206) 623-4382

The debtor filed a pro se voluntary chapter 11 on July 27, 2010 which was assigned case number 10-18671. On August 9, 2010 the case was dismissed for failure to meet minimum filing requirements such as a master mailing list, small business balance sheet, cash flow statement, statement of operations and federal tax returns.

The debtor filed a voluntary chapter 11 bankruptcy petition on August 19, 2010 which was assigned case number 10-19817.

A motion to appoint a chapter 11 trustee was filed on October 22, 2010 (docket #32). An order was entered appointing a Chapter 11 Trustee pursuant to court order dated December 17, 2010 (docket #69). Ronald G. Brown was appointed as the Chapter 11 Trustee pursuant to Court order dated December 22, 2010 ("docket #73).

Motion to Shorten Time

Cindy Loegering and/or the debtor have been collecting the rental income for the rental properties since the Trustee was appointed. Despite demand for turnover no rents have been turned over.

The Trustee needs to obtain an order compelling turnover of the rental income as soon as possible.

March 11, 2011 is the last hearing date before April, 2011 and the Trustee's needs to have this matter heard before April, 2011.

WHEREFORE, the Trustee requests that this Court shorten time to allow a hearing to be held on Friday, March 11, 2011 at 9:30 a.m. with all responses and objections due on or before noon on Monday, March 4, 2011.

Dated this 22nd day of February, 2011.

Wood & Jones, P.S.
303 N. 67th Street
Seattle WA 98103
(206) 623-4382

WOOD & JONES, P.S.

/s/ Denice E.Moewes

Denice E. Moewes, WSB # 19464
Attorney for Chapter 11 Trustee
Ronald G. Brown

Wood & Jones, P.S.
303 N. 67th Street
Seattle WA 98103
(206) 623-4382